

## **Abstract**

### **Private international law from a comparative perspective (comparison of a particular segment in Czech law and the law of a selected country)**

The aim of this thesis is to compare the provisions of the Czech and Italian private international law respective to the issue of applicable law and recognition of trusts.

The thesis is composed of six main chapters, introduction and conclusion.

Second chapter refers to the historical concept of trusts with particular focus on the historical development in Czech legal system.

Third chapter is focused on the notion of trust within the terms of the Act no. 89/2012 Coll., Civil Code and the Hague Convention on the Law Applicable to Trusts and on their Recognition as well as its unique implementation allowing creation of specific Italian trusts, so-called *trusts interni*.

Fourth and fifth chapter are dedicated to the complex analysis of provisions of the Act no. 91/2012 Sb., on Private International Law and the Hague Convention, in particularly extent of the application, the choice of law, applicable law, change of law, *depeçage*, and recognition of trusts.

European legislation overview and possible grounds for further development are described in the sixth chapter.

Seventh chapter describes practical aspects of the applicable law and recognition of trusts.